ED 155 882 ANALYSIS OF STATE IEP MONITORING & COMPLIANCE PROCEDURES AS FOUND I
ANNUAL PROGRAM PLANS. FOLEY, LINDA S.; HOLLAND, CAROL A. MID-EAST
1 OF 1 REGIONAL RESOURCE CENTER, WASH., D.C.; NAT. ASSOC. OF STATE DIREC-
TORS OF SPECIAL EDUCATION, WASHINGTON, D.C. 1978 23P.

DOCUMENT RESUME

ED 155 882 EC 110 914

AUTHOR Foley, Linda S.; Holland, Carol A.
TITLE Analysis of State IEP Monitoring and Compliance Procedures as Found in Annual Program Plans.
INSTITUTION Mid-East Regional Resource Center, Washington, D.C.; National Association of State Directors of Special Education, Washington, D.C.
SPONS AGENCY Office of Education (DHEW), Washington, D.C.
PUB DATE 78
CONTRACT 300-77-0482
NOTE 23p.; For related information, see EC 110 913

EDRS PRICE MF-$0.83 HC-$1.67 Plus Postage.
DESCRIPTORS Elementary Secondary Education; *Handicapped Children; *Individualized Programs; Program Planning; *State Surveys

ABSTRACT

The booklet presents information derived from approved program plans of 12 states on state monitoring and compliance procedures for individualized educational programs (IEPs) for handicapped students as mandated by P.L. 94-142, The Education for All Handicapped Children Act. Matrices are presented for the following considerations: purpose, sources of authority, responsibility, implementation, data needs, and feedback/followup. Data is presented for Arkansas, Connecticut, Georgia, Louisiana, Maine, Maryland, Massachusetts, Missouri, North Carolina, Oklahoma, South Carolina, and Tennessee. (CL)

****
* Reproductions supplied by EDRS are the best that can be made *
* from the original document. *
****

ED155882

U.S. DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

THIS DOCUMENT HAS BEEN REPRODUCED EXACTLY AS RECEIVED FROM THE PERSON OR ORGANIZATION ORIGINATING IT. POINTS OF VIEW OR OPINIONS STATED DO NOT NECESSARILY REPRESENT OFFICIAL NATIONAL INSTITUTE OF EDUCATION POSITION OR POLICY

ANALYSIS OF STATE IEP MONITORING AND COMPLIANCE PROCEDURES AS FOUND IN ANNUAL PROGRAM PLANS

Prepared

by

THE MID-EAST REGIONAL RESOURCE CENTER

Distributed

by

THE NATIONAL ASSOCIATION OF STATE DIRECTORS OF SPECIAL EDUCATION

EC 110 91 4

MERRC
The Mid-East Regional Resource Center
1901 Pennsylvania Avenue, Northwest, Suite 505
Washington, D.C. 20006 (202) 676-7200

NASDSE
The National Association of State Directors of
Special Education
1201 Sixteenth Street, Northwest
Washington, D.C. 20036 (202) 833-4193

1978

This project was funded by the U.S. Office of Education; Department of Health, Education and Welfare under Part C of the Education of Handicapped Act, P.L. 91-230 Title VI, as amended. Technical assistance was provided by the Mid-East Regional Resource Center through the Bureau of Education for the Handicapped contract OEC-300-77-0482. The opinions expressed herein do not necessarily reflect the position or policy of the U.S. Office of Education, and no official endorsement by the U.S. Office of Education should be inferred.

Preface

The following document is a refinement of the matrix of common elements (Resource Packet, II) that was distributed to seminar participants. Included is a flow chart depicting the sequence of activities necessary for the design and implementation of a responsive monitoring system. Six areas are addressed: purpose, authority/ standards, responsibility, implementation, data needs, and feedback/ follow-up. Each area is discussed in terms of the rationale for its inclusion in a monitoring system and commonalities among states are noted.

The graphic presentation of information gleaned should prove helpful to those responsible for both designing and conducting monitoring procedures. As of February 28, 1978, nineteen states had approved Annual Program Plans. MERRC, due in part to its proximity to BEH, was able to obtain sufficient information on twelve of the nineteen approved. The reader is cautioned against inferring that MERRC has attempeted in any way to evaluate those states cited. The collection of data shown is drawn solely from state plans (Title VI, part B, EHA as amended by P.L. 94-142) and thus a positive (+) or a negative (-) notation means only that this element was or was not contained in the APP. While an element may not have been contained in the APP, it may very well be found in a subsequent document. Many states have developed Monitoring Guidelines containing more detail which are available upon request to the individual state.

Table of Contents

Preface v

Flowchart of Activities..... 1

Purpose 2

Authority/Standards 3

Responsibility 4

Implementation 7

Data Needs 13

Feedback/Follow-up 15

Summary 17

Background

On March 7 & 8, 1978, MERRC sponsored a working seminar entitled: "IEP Monitoring and Compliance Procedures", which was held in Washington, D.C. This multi-state activity was conducted in response to a commonality of needs noted among the four states, Delaware, Maryland, North Carolina, and West Virginia, in the Mid-East Region with respect to IEP monitoring and review procedures.

Prior to the seminar, a request was made by Tom Pledgie, of the Delaware State Department of Education, and supported by the MERRC Advisory Board, that the Annual Program Plans approved by BEH to date be examined for commonalities in their monitoring systems. Pursuant to that request, a matrix was designed to accomodate the data gathered. A resource packet, containing the matrix and other sources of information, was compiled and distributed to participants for their use during the seminar. A complete lisiting of the packet's contents is given on the next page.

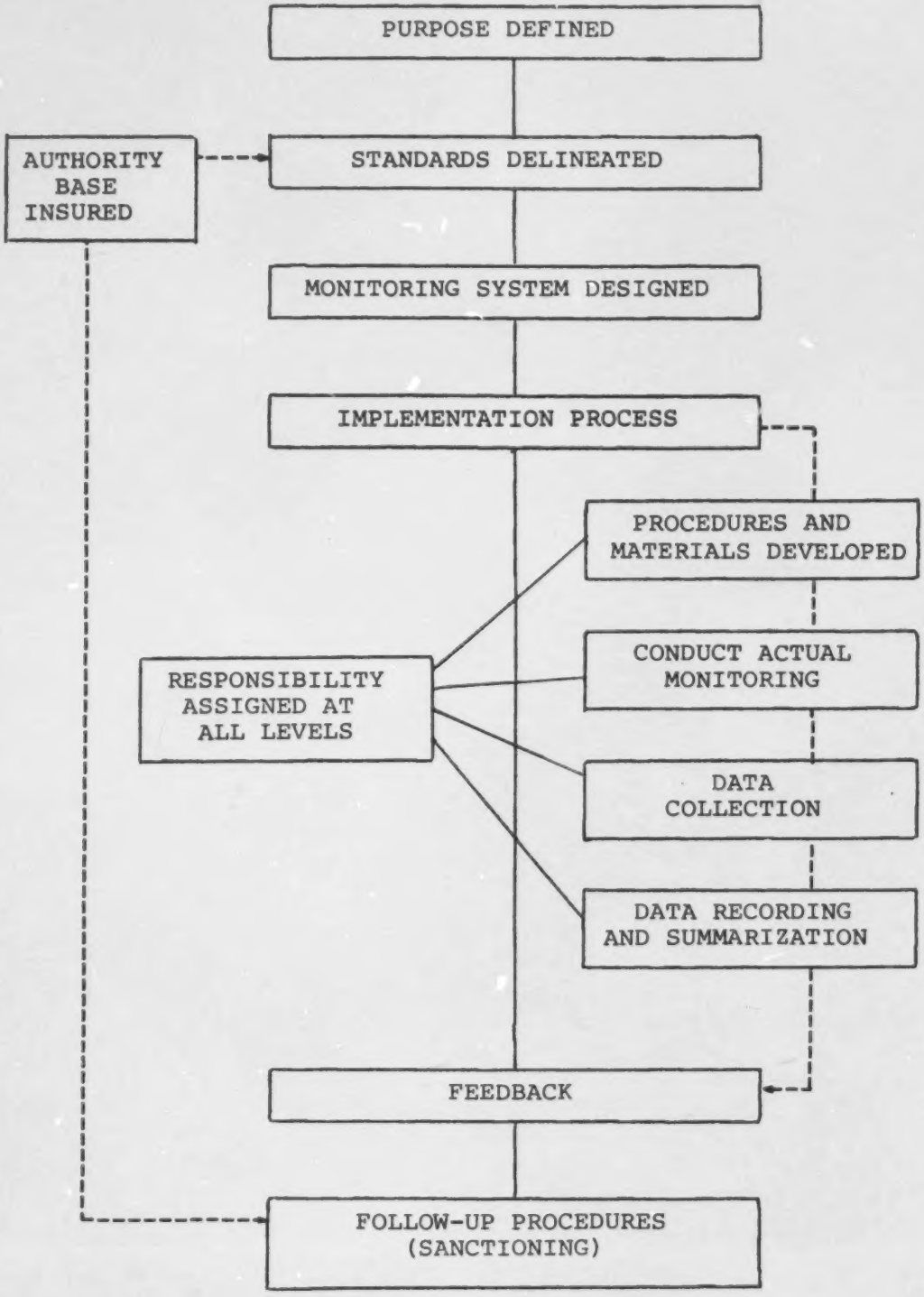
Each state was invited to send three SEA staff members who have primary responsibility for reviewing LEA applications and developing and implementing IEP review and compliance monitoring procedures. The participants worked together, sharing progress made to date in their respective states, and received input from the resource person present. The concept of monitoring was introduced by Bill Schipper, NASDSE. Dave Dawson from the Office of Civil Rights discussed standards for monitoring with respect to Section 504 of the Rehabilitation Act of 1973. Jerry Vlasak, of the Bureau of Education for the Handicapped, reviewed the requirements of P.L. 94-142, 89-313, and deliniated specifically IEP procedures. Don Johnson, of the Arizona State Department of Education, shared the methods and procedures being utilized by Arizona and the refinements made as a result of initial field work.

In addition to the seminar participants whose work is reflected here, special thanks are extended to Jerry Vlasak, BEH, for his assistance with the definition and delineation of standards to be addressed, to Bill Schipper, NASDSE, for providing background information upon which the detail presented here rests, and to Ray Cottrell, MERRC, for assisting with the design format for the material herein.

Linda S. Foley
Educational Program Specialist
MERRC

Carol A. Holland
Research Assistant
MERRC

FLOW OF ACTIVITIES FOR IEP MONITORING AND COMPLIANCE PROCEDURES



PURPOSE

Rationale

Essential to the development of a monitoring system is the determination of its purposes. Specific questions need to be asked and subsequently answered. Why monitor? What is looked for when monitoring? What will be done with information gained from the activity? What benefits will be derived, by whom? States have an obligation to handicapped children and their parents to not only provide them with a free appropriate public education but to also review the prescribed programs at least annually as mandated by P.L. 94-142.

Data needed to allocate resources, design suitable in-service training programs, and assign appropriate staff can also be gleaned through a well designed monitoring system if these needs are considered in the original purpose.

Commonalities

In the annual plans reviewed, the most frequently noted purposes for monitoring were:

1) to meet BEH compliance requirements;
2) to identify technical assistance needs and;
3) to improve the quality of educational programs for handicapped children in the states.

Frequency Chart

CONSIDERATIONS	BEH APPROVED APPs AS OF 2/28/78												
Have the purposes of monitoring been clearly specified?	ARKANSAS	CONNECTICUTT	GEORGIA	LOUISIANA	MAINE	MARYLAND	MASSACHUSETTS	MISSOURI	NORTH CAROLINA	OKLAHOMA	SOUTH CAROLINA	TENNESSEE	FREQUENCY
°compliance with rules regulations and policy	+	+	+	+	+	+	+	+	+	+	+	+	12
°identify technical assistance needs	-	+	+	+	+	+	+	+	+	-	-	+	9
°improve the quality of special education programs	+	+	+	+	+	+	+	+	+	+	+	+	12

AUTHORITY/STANDARDS

Rationale

The standards for performance with respect to IEP implementation must be clearly specified, so actual performance can be measured and compared to these standards. Any discrepancy then becomes the basis for making improvements to the overall delivery system or an individual IEP.[1]

Standards should reflect clearly both the authority (state, federal, local) from which they are derived and the persons responsible for ensuring adherance thereto.

Commonalities

In each case, standards were delineated after the purpose(s) for the monitoring system was clearly established. From those standards, materials and procedures for IEP process review were designed. In all cases, it was noted that the design and implementation a monitoring system was based on state expectancy for local performance. Federal legislation and state statutes provided the common basis for those expectations although some variation in policies and procedures did occur from LEA to LEA.

Frequency Chart

CONSIDERATIONS	BEH APPROVED APPs AS OF 2/28/78												
Have the sources of authority for the areas of performance been determined?	ARKANSAS	CONNECTICUTT	GEORGIA	LOUISIANA	MAINE	MARYLAND	MASSACHUSETTS	MISSOURI	NORTH CAROLINA	OKLAHOMA	SOUTH CAROLINA	TENNESSEE	FREQUENCY
°federal legislation	+	+	+	+	+	+	+	+	+	+	+	+	12
°state laws	+	+	+	+	+	+	+	+	+	+	+	+	12
°local policy	+	+	+	+	+	+	+	+	+	+	+	+	12

[1] Developing the Compliance Monitoring System in Special Education: A Process Manual for State and Local Education Agencies. NASDSE, 1977.
Yavorsky, Diane Kyker. Discrepancy Evaluation: A Practitioner's Guide. University of Virginia, 1976.

Frequency Chart (Authority/Standards Cont'd.)

CONSIDERATIONS	BEH APPROVED APPs AS OF 2/28/78												
Have the standards for monitoring been identified?	ARKANSAS	CONNECTICUTT	GEORGIA	LOUISIANA	MAINE	MARYLAND	MASSACHUSETTS	MISSOURI	NORTH CAROLINA	OKLAHOMA	SOUTH CAROLINA	TENNESSEE	FREQUENCY
°contains specifications drawn from authority base.	+	+	+	+	+	+	+	+	+	+	+	+	12
°measurable, formate that is applicable and complete.	-	+	-	+	-	+	+	+	-	+	+	+	8
°insures authority base	+	+	+	+	+	+	+	+	+	+	+	+	12

RESPONSIBILITY

Rationale

Once the authority for the standards to be monitored has been clearly established, those persons responsible for monitoring must be identified. Each person in the organization should clearly understand and have the capabilities to perform the tasks required of him. Further, provisions should be made so that those persons implementing the programs which are the target of these monitoring activities also understand the role of monitors.

Expected outcomes for monitoring activities should be mutually perceived by both program implementers and program evaluators. Sources for follow-up technical assistance, in the case of non-compliance, should be well-known to both parties. Shared understanding of the function of monitoring activities increases the likelihood of obtaining meaningful data. This data provides the basis for future planning activities.

Commonalities (Responsibility Cont'd.)

All the states were precise in their assignment of persons responsible for monitoring. Each one brought out the fact that SEA staff would have the primary responsibility for management and coordination of the process. They all made it a point to specify that some individual on the SEA staff would serve as chairperson or team leader for each "monitoring team". Provisions were made for selection of the monitoring team personnel and role descriptions were discussed, in some cases in great detail. Three states, Georgia, Louisiana, and Maryland, went a step further to discuss within their annual Plans specific selection and training procedures for their monitoring personnel. These three states felt strongly that special training for their monitors was of major importance, as in many cases the staff assigned to monitoring tasks may lack not only the specific skills necessary for conducting monitoring but also may lack sufficient awareness of the standards and authority governing that activity. Monitoring activities carry with them implications for impact to the local and intermediate units as well as the specific programs being monitored.

Shared, too, was the belief that the following are significant activities and the responsibility for each should remain with the SEA staff:

1) preparation of report findings;

2) delivery of feedback to monitored programs regarding:
   a) present deficiencies,
   b) specific program improvements needed,
   c) areas where technical assistance would be beneficial.

3) provision and coordination of technical assistance in response to requests

4) description of necessary corrective actions to be taken to reach compliance and specification of sanctions/ consequences to follow if compliance is not achieved.

Frequency Chart (Responsibility Cont'd.)

CONSIDERATIONS	BEH APPROVED APPs AS OF 2/28/78												
Has responsibility been assigned at all levels for implementation of the system?	ARKANSAS	CONNECTICUTT	GEORGIA	LOUISIANA	MAINE	MARYLAND	MASSACHUSETTS	MISSOURI	NORTH CAROLINA	OKLAHOMA	SOUTH CAROLINA	TENNESSEE	FREQUENCY
°coordinating and managing the process	+	+	+	+	+	+	+	+	+	+	+	+	12
°choosing monitoring personnel	+	+	+	+	+	+	+	+	+	+	+	+	12
°training monitoring personnel	-	-	+	-	-	+	-	-	-	-	-	-	2
°serving on the monitoring team	+	+	+	+	+	+	+	+	+	+	+	+	12
°serving as chairperson of the monitoring team and process chairperson, team, and administrator	+	+	+	+	+	+	+	+	+	+	+	+	12
°writing the preliminary and/or final report	+	+	+	+	+	+	+	+	+	+	+	+	12
°providing feedback to the site	-	+	+	+	+	+	+	+	+	+	+	+	11
°providing follow-up	-	+	+	+	+	+	+	+	+	+	+	+	11
°providing technical assistance	-	+	+	+	+	+	+	+	+	-	-	+	9
°implementing sanctioning procedures	-	+	+	+	+	+	+	+	+	+	+	-	10
°responding to problems and/or requests	-	+	+	+	+	+	+	+	+	-	-	+	9

IMPLEMENTATION

Rationale

Methodology and material design are interrelated and interdependent. Successful implementation of a monitoring system depends heavily on suitable materials to gather the data needed, skilled monitors able to use instruments effectively, and finally the appropriate management of each step in the chain of events. The latter includes design through site-visit, feedback, and sanctioning procedures to ensure that meaningful integration of activities does occur.

Commonalities

While a great degree of variation existed in methodology, each state surveyed was precise in describing the process it would employ for IEP monitoring. The differences noted were due, for the most part, to the differing geographic and demographic needs of states, i.e., the number of handicapped children, the number of LEAs to be visited, as well as physical size and location of LEAs.

Most often the states chose the self-evaluation model, using SEA/LEA staffs for LEA monitoring and were consistent in their ability to substantiate it as efficient and effective for their purposes. Only one of the states, as indicated in the APPs reviewed, chose to use a third-party technique. In this model, staff from outside the state are employed on a subcontractual arrangement to conduct LEA monitoring and report their findings to the SEA.

Sampling procedures varied from state to state. Each state developed a unique system for sampling to meet its own specific needs.

Specific Examples Cited

Examples of some states sampling procedures for monitoring site visits are as follows:

Louisiana made provisions for each LEA to be visited at least once a year by State Department of Education personnel for monitoring activities. "During FY'78, each school system in Lousiana shall be monitored by the SDE (State Department of Education) on at least five occasions (one in-depth and four SDE/LEA Parish Plan monitoring)."[2] "All school systems in Louisiana shall be visited once each year for in-depth compliance monitoring. The SDE, using a table of random number, will select 10% of the resource rooms and 10% of the self-contained special education classes for monitoring."[3]

[2]Louisiana's Approved Annual Program Plan, Fiscal Year 1978, Under Part B, of the Education of the Handicapped as ammended by Public Law 94-142, p. 127.

[3]Ibid, p. 129.

Georgia utilized a cyclical procedure for selection of the sites to be visited. Each year site evaluation visits will be made to one third (1/3) of the school systems and state-operated institutions in Georgia. "During FY'78, selection of the agencies will be made on a random basis. During FY'79, a random selection from those not visited in FY'78 and a random selection visited in FY'78 will determine on-site evaluations. During FY'80, the remaining agencies not visited in either of the two prior years as well as those previously visited will be evaluated."[4]

Connecticut developed systematic procedures for site visitations. "Direct site monitoring will be accomplished by professional staff members of SEA subject to personnel availability. The target number of state agencies to be site monitored in the 1977-78 school year is three; the target number of LEAs to be site monitored during the period of 1977 to 1980 is 169. The P.L. 94-142 monitoring coordination chart (which is found on the following page) indicates the annual program plan sections to be addressed during site monitoring. The desired number of SEA staff for site monitoring is 2.4 equivalent educational consultants."[5] "The chart letters indicating the frequency of monitoring for each plan section by monitoring method are defined as follows:

C = cycle; monitoring is done with a sample of LEAs each year so that every LEA is monitored once every six years.

P = partial; each year, monitoring will be done with a sample of LEAs composed of: LEAs randomly selected, LEAs selected on the basis of irregular statistical data submitted to the SEA, and LEAs selected by the SEA for monitoring due to frequent receipt of written complaints with respect to EHA-B Compliance.

F = full; each year, monitoring will be done with the full number of EHA-B participating LEAs."[6]

[4] Georgia's Approved Annual Program Plan, Fiscal Year 1978, Under Part B, of the Education of the Handicapped as ammended by Public Law 94-142, p. 74.

[5] Connecticut's Approved Annual Program Plan, Fiscal Year 1978, Under Part B, of the Education of the Handicapped as ammended by Public Law 94-142, p.55.

[6] Ibid, p.53.

P.L. 94-142 Monitoring Coordination Chart[7]

Plan Section		Method of Monitoring					
		LEA Plan	SEMIS	Site Visit	Complaint	740-100	Audit
I.	Public Notice and Opportunity for Comment						
II.	Right to Education Policy Statement						
III.	Full Educational Opportunities Goal and Timelines	F					
IV.	Policy on Priorities	F		P			C
V.	Child Identification	F	F	P	F	F	
VI.	Individual Educational Program	F	F	P	F	F	
VII.	Procedural Safeguards	F	F	P	F	F	
VIII.	Least Restrictive Environment	F	F	P	F	F	
IX.	Protection in Evaluation Procedures	F	F	P	F	F	
X.	Comp. System of Personnel Development	F		P			
XI.	Part. of Private School Children	F	F	P	F		C
XII.	Plmt. in Private Schools	F	F	P	F	F	
XIII.	Recovery of Funds						C
XIV.	Hearing on LEA Application						
XV.	Annual Evaluation	F	F	P	F	F	
XVI.	Preschool	F		F	F		C

[7]Ibid.

Frequency Chart (Implementation Cont'd.)

CONSIDERATIONS	BEH APPROVED APPs AS OF 2/28/78												
Has the model chosen been substantiated in terms of effectiveness, needs, capabilities?	ARKANSAS	CONNECTICUT	GEORGIA	LOUISIANA	MAINE	MARYLAND	MASSACHUSETTS	MISSOURI	NORTH CAROLINA	OKLAHOMA	SOUTH CAROLINA	TENNESSEE	FREQUENCY
°self-evaluation	+	+	-	+	+	+	+	+	+	+	-	+	10
°peer monitoring	-	-	-	-	-	-	-	-	-	-	-	-	0
°SEA monitoring	+	+	+	+	+	+	+	+	+	+	+	+	12
°third party monitoring	-	-	+	-	-	-	-	-	-	-	-	-	1
Have the content areas to be monitored been identified?													
°procedural requirements	+	+	+	+	+	+	+	+	+	+	+	+	12
°service area (e.g. speech therapy)	+	+	+	+	+	+	+	+	+	+	+	+	12
°program component (e.g. early childhood)	+	+	+	+	+	+	+	+	+	+	+	+	12
Have the criteria for selection and procedures been established?													
°availability	-	+	+	+	-	+	+	-	+	-	+	+	8
°knowledge of law	-	-	+	+	-	+	+	-	+	-	-	+	6
°role descriptions expertise	-	-	+	+	-	+	+	-	+	-	-	-	5
°appointments	-	-	+	-	-	-	-	-	-	-	-	-	1
°volunteer	-	-	-	-	-	-	-	-	-	-	-	-	0
°rotating task	-	+	+	-	-	-	+	-	-	-	-	-	3
°consultant	-	-	-	-	-	-	-	-	-	-	-	-	0
°who will be trained (e.g., total staff, team leader)	-	-	+	+	-	+	-	-	-	-	-	-	3

Frequency Chart (Implementation Cont'd.)

CONSIDERATIONS	BEH APPROVED APPs AS OF 2/28/78												
Have the criteria for selection and procedures been established?	ARKANSAS	CONNECTICUT	GEORGIA	LOUISIANA	MAINE	MARYLAND	MASSACHUSETTS	MISSOURI	NORTH CAROLINA	OKLAHOMA	SOUTH CAROLINA	TENNESSEE	FREQUENCY
°focus of training (e.g., the law, writing reports, sensitivity to people in monitoring programs, examination of files, interviewing techniques	-	-	+	+	-	+	-	-	-	-	-	-	3
°where and when training will occur (e.g. statewide workshop once a year, as part of on-site preparation	-	-	+	+	-	+	-	-	-	-	-	-	3
Do scheduling procedures allow for a consideration of constraints on the system monitored?													
°interview time of specific staff members	-	+	+	-	+	-	-	-	-	-	-	-	3
°availability of records in spec. locations	-	+	+	+	+	+	+	-	-	-	+	+	8
°number of staff to be interviewed	-	+	+	+	+	+	+	-	-	-	+	+	8
°number and location of schools	+	+	+	+	+	+	+	-	-	-	+	+	9
°minimizing travel time	-	-	-	-	-	-	-	-	-	-	-	-	0
°minimizing logistical problems	-	+	+	+	+	+	+	-	-	-	+	+	8

Frequency Chart (Implementation Cont'd.)

CONSIDERATIONS	BEH APPROVED APPS AS OF 2/28/78												
Have systematic procedures beem established for sampling sites, programs and procedures?	ARKANSAS	CONNECTICUT	GEORGIA	LOUISIANA	MAINE	MARYLAND	MASSACHUSETTS	MISSOURI	NORTH CAROLINA	OKLAHOMA	SOUTH CAROLINA	TENNESSEE	FREQUENCY
°systematic rotation	-	+	+	-	+	+	+	-	-	-	-	-	5
°random sampling	-	-	+	+	-	+	-	-	-	-	+	-	4
°number of visits to site	+	+	+	+	+	+	+	+	+	-	+	+	11
°response to request or problem at site	-	+	+	+	+	+	+	+	+	-	-	+	9
Does the process fit the realities of the situation?													
°total number of districts to be monitored	+	+	+	+	+	+	+	+	+	+	+	+	12
°number of available staff	-	+	+	+	+	+	+	-	-	-	-	+	7
°availability of regional personnel to conduct monitoring	-	+	+	+	+	+	+	-	-	-	-	+	7

12

DATA NEEDS

Rationale

Prior to the actual monitoring, i.e., the implementation phase, the types of data needed, its intended purpose and the method by which it will be collected must be determined. Instrument design should allow for efficient collection, organization and summarization of data, yielding useful information to decision makers for programs at state and local levels.

Commonalities

Analysis of the plans revealed each state had systematized data collection activities, clearly delegating responsibilities and establishing firm timelines. Although these states specified types of data to be collected, how often, by whom and percentages of IEPs to be reviewed, each noted that actual field experiences may often indicate a need for system refinement, which would occur accordingly.

Most often the interview was the primary tool used by the monitoring team to gather needed information. However, questionnaires as well as on-site observation by team members were utilized to glean appropriate data.

Frequency Chart

CONSIDERATIONS	BEH APPROVED APPs AS OF 2/28/78												
Has an integrated system for summarizing, recording, storing and maintaining data been established across different levels of the process?	ARKANSAS	CONNECTICUT	GEORGIA	LOUISIANA	MAINE	MARYLAND	MASSACHUSETTS	MISSOURI	NORTH CAROLINA	OKLAHOMA	SOUTH CAROLINA	TENNESSEE	FREQUENCY
°manual or computer system established	+	+	+	+	+	+	+	+	+	-	+	+	11
°responsibility assigned	+	+	+	+	+	+	+	+	+	-	+	+	11
°timelines set	+	+	+	+	+	+	+	+	+	-	+	+	11

Frequency Chart (Data Needs Cont'd.)

CONSIDERATIONS	BEH APPROVED APPs AS OF 2/28/78												
Have the types of data needed for each identified purpose been outlined?	ARKANSAS	CONNECTICUT	GEORGIA	LOUISIANA	MAINE	MARYLAND	MASSACHUSETTS	MISSOURI	NORTH CAROLINA	OKLAHOMA	SOUTH CAROLINA	TENNESSEE	FREQUENCY
°frequency	+	+	+	+	+	+	+	+	+	-	+	-	10
°quality ratings	+	+	+	+	+	+	+	+	+	+	+	+	12
°percentage	-	+	-	+	-	+	-	+	+	-	-	-	5
Have techniques for collecting data been specified?													
°questionnaire	-	+	+	+	+	+	+	-	-	-	+	+	8
°interview	+	+	+	+	+	+	+	+	+	-	+	+	11
°checklist	-	+	+	+	+	+	+	+	-	-	+	+	9
°observation	+	+	+	+	+	+	+	+	+	-	+	+	11

FEEDBACK/FOLLOW-UP

Rationale

Systems are monitored to verify that correct procedures are in place and to provide feedback to systems monitored so appropriate corrective measures can be taken. Results from monitoring activities must be summarized, information then analyzed so that the feedback given to the individual programs/localities is in understandable format. Results should also be written, allowing recipients to refer to specific sections repeatedly, as needed. Finally, of great importance, are the follow-up events that take place enabling systems to bring their programs into compliance.

During the follow-up phase, the programs that have been monitored make plans to implement the corrective procedures that have been indicated as necessary. Technical assistance is sought from the SEA and other resources available. In the event that programs are not brought into compliance, consequences are determined and the appropriate sanctioning occurs.

Commonalities

In all cases, verbal feedback to sites visited was followed with a written report. This report served as a planning document to the programs monitored for correcting deficiencies and requesting technical assistance as needed. Although the states all mentioned sanctioning actions would follow if corrections were not made within a given time period, they were not equally explicit as the exact nature of the consequences.

Frequency Chart

CONSIDERATIONS	BEH APPROVED APPs AS OF 2/28/78												
Has the format and responsibility for feedback to the monitored program been delineated?	ARKANSAS	CONNECTICUT	GEORGIA	LOUISIANA	MAINE	MARYLAND	MASSACHUSETTS	MISSOURI	NORTH CAROLINA	OKLAHOMA	SOUTH CAROLINA	TENNESSEE	FREQUENCY
°written report	+	+	+	+	+	+	+	+	+	+	+	+	12
°on site team	+	+	-	-	-	+	+	+	-	-	-	+	6
°team chairperson	-	-	+	+	+	-	+	+	+	+	-	+	8
°SEA Staff members	+	+	+	+	+	+	+	+	+	+	+	+	12

Frequency Chart (Feedback/Follow-up Cont'd.)

CONSIDERATIONS	BEH APPROVED APPs AS OF 2/28/78												
Has a systematic procedure been established for follow-up	ARKANSAS	CONNECTICUT	GEORGIA	LOUISIANA	MAINE	MARYLAND	MASSACHUSETTS	MISSOURI	NORTH CAROLINA	OKLAHOMA	SOUTH CAROLINA	TENNESSEE	FREQUENCY
°reporting	+	+	+	+	+	+	+	+	+	+	+	+	12
°correction of deficiencies	+	+	+	+	+	+	+	+	+	+	+	+	12
°technical assistance	-	+	+	+	+	+	+	+	+	-	-	+	9
°appeal procedures	+	+	+	-	+	-	+	+	+	-	-	+	8
°sanctioning procedures	-	+	+	-	+	+	+	+	+	+	+	+	10
Are the procedures delineated for the documentation of compliance violations?													
°LEA required to prepare correction plan	-	+	+	+	+	+	+	+	+	+	-	+	10
°SEA or regional office required to provide technical assistance	-	+	+	+	+	+	+	+	+	-	-	+	9
°funds withheld or withdrawn	-	-	+	-	-	-	-	-	-	-	+	-	2
°district or school accreditation modified or removed	-	-	-	-	-	-	-	-	-	-	-	-	0
°other necessary action	-	+	+	-	-	-	-	-	-	-	+	-	3
Does the process include a consideration of Federal, statewide and/or local priorities?													
°establishing new programs	-	+	+	+	+	+	+	+	+	-	-	+	9
°refining IEPs	+	+	+	+	+	+	+	+	+	+	+	+	12
°increasing number of children served	-	+	+	+	+	+	+	+	+	+	+	+	11

Summary

The preceding information has been distributed, as it is felt that states beyond the Mid-East Region could also profit from examination of the areas addressed and considerations delineated within each. The considerations reflect those items which, at the time of matrix design, seem(ed) optimal for inclusion in a monitoring system. Only approved Annual Program Plans were analyzed for element/consideration inclusion; this was done to ascertain what was required of states by the Bureau of Education for the Handicapped. The reader is reminded that while some elements may not be articulated in the APP, they may be addressed in other state documents.

In the event that information contained in the Resource Packet (pp. ii, iii) should prove useful, it may be obtained from your local Regional Resource Center, as each received a packet subsequent to the MERRC Seminar. Techincal assistance in the areas of IEP review and compliance monitoring may be obtained through the Regional Resource Center and NASDSE, respectively.